

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
COLUMBIA DIVISION**

**BRANDON FRAZIER,**

**Plaintiff,**

**v.**

**ENOCH GEORGE, Sheriff of Maury County;  
LT. DEBORAH WAGONSHUTZ; FLOYD SEALEY;  
MAURY REGIONAL MEDICAL CENTER; ABL  
MANAGEMENT, INC.; and GENELLA POTTER**

**Defendants.**

**No. 1:12-cv-00128  
Chief Judge Haynes  
Jury Demand**

*overruled*  
*There are no reasons*  
*DENIED for the reasons*  
*set forth in Plaintiff's*  
*opposition DEWE 54.*  
*Full*  
*over*  
*4-1-14*

**MOTION FOR PROTECTIVE ORDER AND TO QUASH NOTICES OF DEPOSITION**

The Defendants, Floyd Sealey and Maury Regional Medical Center, move this Court, pursuant to Rule 26 of the Federal Rules of Civil Procedure, to enter an Order limiting the scope of the second deposition of Floyd Sealey to the medical files of Plaintiffs Brandon Frazier and Chad Martin and quashing the Notices of Deposition for Mr. Sealey in the Frazier and Martin matters.

As grounds and as more fully explained in the memorandum of law filed herewith, the Defendants would show the Court that a second, limitless deposition of Mr. Sealey would be unreasonably duplicative and unduly burdensome and expense. Attached hereto as Exhibit A is a Statement of Good Faith, certifying that Defendants' counsel conferred with Plaintiffs' counsel, prior to filing this motion, to resolve the issue of the scope of Mr. Sealey's second deposition; the parties were unable to reach an agreement.